

David A. Ward
New Jersey Bar No. 042381996
dward@klugerhealey.com
KLUGER HEALEY, LLC
521 Newman Springs Road, Suite 23
Lincroft, NJ 07738
Telephone: (973) 307-0800

**ATTORNEYS FOR PLAINTIFF
SOCIAL POSITIONING INPUT SYSTEMS, LLC**

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**SOCIAL POSITIONING INPUT SYSTEMS,
LLC,**

Plaintiff,

v.

PERVASIVE GROUP, INC.,

Defendants.

Case No. 23-cv-1488 (ES)(AME)

**JOINT STIPULATION
TO STAY ALL PENDING
MOTIONS, ACTIONS AND
DEADLINES**

Plaintiff Social Positioning Input Systems, LLC and Defendant Pervasive Group, Inc. (collectively “the Parties”) are currently in settlement discussions, and thus respectfully request that the Court stay all pending motions, actions and deadlines for thirty (30) days, up to and including June 21, 2023, while the Parties negotiate a resolution of this lawsuit, including the submission of a Motion to Dismiss. The requested stay is not for delay, but only to allow for an orderly resolution of this lawsuit.

Dated: May 22, 2023

Respectfully Submitted,

/s/ David A. Ward

KLUGER HEALEY, LLC

David A. Ward

521 Newman Springs Road, Suite 23

Lincroft, NJ 07738

Tel: (973) 307-0800

Fax: (888) 635-1653

dward@klugerhealey.com

Attorneys for Plaintiff

/s/ Michael T. Zoppo

Michael T. Zoppo

FISH & RICHARDSON P.C.

7 Times Square, 20th Floor New York, New

York 10036 Telephone: (212) 765-5070

Facsimile: (212) 258-2291

zoppo@fr.com

Neil J. McNabney (*pro hac vice*)

Noel Chakkalakal (*pro hac vice*)

Michael A. Vincent (*pro hac vice*)

FISH & RICHARDSON P.C.

1717 Main Street, Suite 5000

Dallas, TX 75201

Telephone: (214) 747-5070

Facsimile: (214) 747-2091

mcnabney@fr.com

chakkalakal@fr.com

vincent@fr.com

Attorneys for Defendant